

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF IOWA

In the matter of:	Bankruptcy Case No. 02-00342
Ampel Corporation	
Debtor(s)	

REQUEST FOR CANCELLATION OF HEARING

Now Comes: Twin Rivers Paper Company LLC
707 Sable Oaks Drive
Suite #010
South Portland, ME 04106
207-523-2350

represented by Dilks & Knopik, LLC, and states that:

Competing motions for Payment of Unclaimed Funds were filed by John Marshall (Docket # 487), on February 6, 2013 and by Brian J. Dilks (Docket #490), on February 25, 2013 and that on March 1, 2013, the U.S. Trustee filed an Objection to both motions, due to the competing nature of the claims (Docket # 493, 494).

On March 18, 2013, a Withdrawal of Document other than Proof of Claim was filed by John Marshall (Docket #497), stating, in Part 4 of his Motion to Withdraw that, "..., JM Partners, LLC hereby withdraws its Motion for Payment of Unclaimed Funds, and acknowledges the rights of Twin Rivers to the funds."

As the substantial basis for the U.S. Trustee's objection to the Motion for Payment of Unclaimed Funds (Docket #493 and 494), filed by Brian J. Dilks (Docket #490), that "JM Partners and Twin Rivers Paper Company cannot both be entitled to the unclaimed funds payable to Fraser Papers, Inc." has been resolved and the competing motion has been withdrawn, we respectfully request that the hearing, scheduled for May 17, 2013 at 10:00 a.m. be cancelled and that the Original Order, submitted with our motion be granted.

Date: March 20, 2013

Signature: _____

Brian J. Dilks, Managing Member
Dilks & Knopik, LLC
35308 SE Center St
Snoqualmie, WA 98065
(425) 836-5728

SUBSCRIBED AND SWORN before me this 20th day of March, 2013

Signature: _____

Andrew T. Drake

NOTARY PUBLIC in and for the State of
Washington, Residing in King County.
My commission expires: August 9, 2015

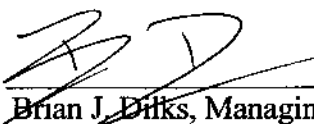


CERTIFICATE OF SERVICE

I, Brian J. Dilks, certify that the Request for Cancellation of Hearing was served via the U.S. Post Office on March 20, 2013, upon the following parties:

U.S. Attorney for the Southern District of Iowa 110 East Court, Suite 286 Room 286 US Courthouse Annex Des Moines, IA 50309	Creditor/Assignee: Fraser Papers LLC ATTN: Glen McMillan / Vice-President 200 Vesey Street 11 th Floor New York, NY 10281-1021
U.S. Trustee for the Southern District of Iowa Federal Bldg., Room 793 210 Walnut St. Des Moines, IA 50309	Case Trustee: Deborah L. Petersen PO Box 893 Council Bluffs, IA 51502-0893
Debtor's Attorney: Steven P Wandro 2501 Grand Avenue, Suite B Des Moines, IA 50312	Debtor: Ampel Corporation PO Box 3628 Urbandale, IA 50322
Interested Party: Twin Rivers Paper Company, LLC 797 Sable Oaks, Suite #010 South Portland, ME 04106	Interested Party: JM Partners LLC 6800 Paragon Place, Suite 202 Richmond, VA 23230

Signature



Brian J. Dilks, Managing Member
Dilks & Knopik, LLC
35308 SE Center St
Snoqualmie, WA 98065
(425) 836-5728

DILKS & KNOPIK, LLC

"When Success Matters"

March 20, 2013

United State Bankruptcy Court
Southern District of Iowa
Attn: Bill Freiburger, Fin. Admin.
U.S. Courthouse Annex
110 East Court, Room 300
Des Moines, IA 50309

RE: Application for the Release of Unclaimed Funds – Request for Cancellation of Hearing

Dear Mr. Freiburger:

Enclosed please find our Request for Cancellation of Hearing, currently scheduled for May 17, 2013 at 10:00 a.m. This is in regard to Case Number 02-00342 and our Motion for Payment of Unclaimed Funds on behalf of Twin Rivers Paper Company, LLC (Docket #490).

We are requesting that the hearing be cancelled and that the original order, submitted with our Motion for Unclaimed Funds, be granted.

Thank you for your attention to this matter.

Sincerely,



Brian J. Dilks

RCIASB 03/25/13 13:55

35308 SE Center ST
Snoqualmie, WA 98065

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